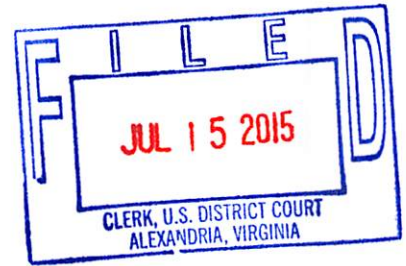


Dr. Ernest Bernard Moore
8816 Seventh Avenue
Inglewood, CA 90305
Tel. 202-904-1993

In Propria Persona



UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

ERNEST BERNARD MOORE
Plaintiff,

CASE NO: 1:15-cv-910 LMB/MSN

-v-

**VERIFIED COMPLAINT FOR LEGAL
MALPRACTICE FOR BREACH OF
ATTORNEY-CLIENT PRIVILEGE
COMMUNICATIONS**

KENNETH MICHAEL ROBINSON
ATTORNEY AT LAW
ROBINSON LAW FIRM
Defendant.

_____/

This is action to recover damages resulting from Defendant Kenneth Michael Robinson's legal malpractice in the breach of attorney-client privilege communication in a bankruptcy proceedings in the United States Bankruptcy Court for the Eastern District of Virginia at Alexandria in the entitled cases In re Kenneth Michael Robinson, Case No: 11-16610-BFK (Chapter 7) and In re: Kenneth Michael Robinson (Ernest Bernard Moore v. Kenneth Michael Robinson), Adversary No. 15-01987-BFK. The Plaintiff seeks damages costs and attorney's fees.

PARTIES

Plaintiff Ernest Bernard Moore (hereinafter "Dr. Moore") is a citizen of the United States of America and a permanent resident of the District of Columbia.

Defendant Kenneth Michael Robinson (hereinafter "Robinson") is a citizen of the Commonwealth of Virginia and is an attorney admitted to practice in the District of Columbia and the State of Maryland including but not limited to being admitted to practice in the United States Court of Appeals' for the Fourth Circuit and District of Columbia Circuit and the United States District Courts for the District of Maryland and the District of Circuit.

BACKGROUND FACTS

Defendant Robinson conspired against his client Dr. Moore with the Chief of Public Corruption (Steven Durham) and the FBI for Moore's cooperation in the undercover reversed-sting operation to entrap sitting members of Congress in a racially-driven public corruption investigation without Dr. Moore's consent or knowledge including but not limited to Timothy Thibault, FBI Agent requesting and Robinson encouraging Moore to set up business meetings with Representative Danny K. Davis a sitting member of Congress to wear a wire while offering more than \$400,000 cash in putative bribe money at the behest of the Chief of Public Corruption. Special Agent Timothy Thibault's instructions were made in Robinson's presence. Dr. Moore declined to participate in the reverse-sting operation that was initiated by Defendant Robinson through Steven Durham, Chief of Public Corruption in the United States Attorney's Office for the District of Columbia.

Robinson has been recent suspended from the practice of law by the District of Columbia Bar as a result of disciplinary action involving three professional ethics charges. When Robinson became aware of the pending disciplinary action, he moved his office to the State of Maryland in an attempt to practice law in that jurisdiction. On April 20, 2011 Dr. Moore filed a diversity civil action for legal malpractice, negligent, incompetency and ineffective assistance of counsel from federal criminal prosecution in the United States District Court for the District of Columbia. The

Plaintiff sought damages in the amount \$5,000,000. Subsequently, the District Court in the District of Columbia denied Robinson's Motion to Dismiss the malpractice action, Robinson filed a Suggestion of Bankruptcy in Chapter 7 proceeding in the United States Bankruptcy Court for the Eastern District of Virginia. Thereinafter, Dr. Moore filed at the direction of the Bankruptcy Court "Proof of Claim and Oppose Any Discharge under Chapter 7 Bankruptcy Proceeding pursuant to 11 U.S.C. §523(a) (4). (Doc. 216) **See Exhibit A (Proof of Claim)** Robinson filed a response entitled "Debtor's Opposition, Objections, to Moore's Claim Against Debtor's Estate and All Claims, and Request a Hearing on this matter on July 14, 2015"¹ (Doc. 223) Subsequently, On June 12, 2015 the Bankruptcy Court entered order directing the Clerk to docket Dr. Moore's Proof of Claim styled "Proof of Claim and Oppose any Discharge Under Chapter 7 Bankruptcy Proceeding Pursuant to 11 U.S.C. § 523(a)(4)" as a Complaint in a separate adversary proceeding in Bankruptcy case. (Doc. 221) **See Exhibit B (Bankruptcy Court Order)**. A separate Adversary Proceeding was filed in Case No. 15-01087-BFK and the Bankruptcy Court's Clerk issued the summons and notice in an adversary proceeding. (Doc. 9) **See Exhibit C (Adversary Proceeding)** Moore executed service of process of the summons and Proof of Claim (Doc.15). On July 8, 2015, Robinson for a Motion to Dismiss plaintiff's complaint which contains several breach attorney-client privilege communication related to Dr. Moore's prior federal criminal prosecution in the United States District Court in the District of Columbia. (Doc. 12)

JURISDICTION AND VENUE

Subject matter jurisdiction is predicated upon diversity of citizenship as set forth in 28 U.S.C. §1332, because (2) it is a civil action; (b) the matter in controversy exceeds the sum or

¹ Robinson's opposition, objection to Moore's Claim against Debtor's Estate contains several bench attorney-client privilege communications.

value of \$75,000 exclusive of interest and costs; and it is an action between citizens of different states.

Venue present in the Eastern District of Virginia pursuant to 28 U.S.C. § 1391 (a) (2) is the judicial district in which a substantial part of the events or omissions gave rise to the claims that occurred. Dr. Moore is a resident of the District of Columbia.

FIRST CAUSE OF ACTION

Defendant Kenneth Michael Robinson, was Plaintiff's retained counsel of record committed a violation of Rule 1.6 of the District of Columbia Rule of Professional Conduct by the disclosures of attorney-client privilege communication. Robinson breach his confidential ethic duty by making disclosures of attorney-client privilege communications on the public docket in the United States Bankruptcy Court for the Eastern District of Virginia, In re Kenneth Michael Robinson, Case No. 11-16610-BFK in docket entries **Doc 216, 223 and 224** including but not limited to erroneous and false statements related to reverse sting operation that targeted members of Congress in the Congressional Black Caucus.

SECOND CAUSE OF ACTION

Defendant Kenneth Michael Robinson, was Plaintiff's retained counsel of record committed a violation of Rule 1.6 of the District of Columbia Rule of Professional Conduct by the disclosures of attorney-client privilege communication. Robinson breach his confidential ethic duty by making disclosures of attorney-client privilege communications on the public docket in the United States Bankruptcy Court for the Eastern District of Virginia, *Adversary Complaint*, In re Kenneth Michael Robinson, (Ernest Bernard Moore v. Kenneth Michael Robinson), Case No. 15-01987-BFK in docket entries Motion to Dismiss (**Doc. No. 12**) including but not limited to erroneous

and false statements related to reverse sting operation that targeted members of Congress in the Congressional Black Caucus.

JURY DEMANS

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedures, Plaintiff hereby demands a jury in the above-entitled action.

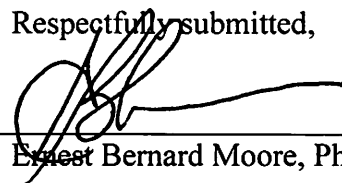
RELIEF

WHEREFORE, Plaintiff Ernest Bernard Moore respectfully requests that this Court grant relief:

1. Judgment against Defendant Kenneth Michael Robinson, Attorney at Law, Robinson Law Firm for compensatory damages in the amount of \$500,000.
2. Punitive damages in the amount of \$5,000,000 for Defendant Kenneth Michael Robinson's egregious breach attorney-client privilege communication filed on the public docket in the two bankruptcy court proceedings in the United States Bankruptcy Court in the Eastern District of Virginia.

DATED: July 13, 2015

Respectfully submitted,

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Ernest Bernard Moore, Ph.D.

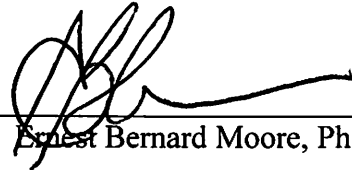
VERIFICATION

STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

I, Ernest Bernard Moore declare and state I am fully competent to make this legal malpractice complaint and I have personal knowledge of the facts stated in the attached complaint. To the best of my knowledge, all of the facts stated in this complaint are true and correct under the penalty of perjury pursuant to 28 U.S.C. § 1746.

Executed on July 13, 2015 at Inglewood, California.

A handwritten signature in black ink, appearing to be 'EB Moore', is written over a horizontal line.

Ernest Bernard Moore, Ph.D.